

EXHIBIT 1

OBJECTION: Answering Defendant objects to this Interrogatory to the extent that it seeks any information beyond the Mariner East 2 project. Any such agreement that is not related to Mariner East 2 is not relevant to the claims or defenses and is not proportional to the needs of the case.

By way of further objection, *see* ECF 131. While Answering Defendant acknowledges Plaintiffs' Second Set of Interrogatories were propounded before this Court's March 4, 2022 Order, Answering Defendant objects to this Interrogatory to the extent that Plaintiffs' request to broaden the scope of discovery was denied.

RESPONSE: Subject to and without waiving these objections, and to the extent Interrogatory No. 1 is not objectionable, Answering Defendant did not enter into any non-disclosure agreement or any other similar agreement pertaining to his publications regarding his work on the Mariner East 2 project.

SIANA LAW

Date: April 7, 2022

By: /s/ Christopher P. Gerber
Christopher P. Gerber, Esquire, I.D. #76449
Connie E. Henderson, Esquire, I.D. #327325
Attorneys for Defendant, *Nick Johnson*
941 Pottstown Pike, Suite 200
Chester Springs, PA 19425
(P): 610.321.5500
(F): 610.321.0505
cpgerber@sianalaw.com
cehenderson@sianalaw.com

VERIFICATION

I, Nicholas Johnson, depose and say that Defendants' Objections and Responses to Plaintiffs' Second Set of Interrogatories are true and correct to the best of my knowledge, information, and belief.

I understand that any false statements therein are subject to the criminal penalties contained in 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.

Date: 4/7/22

By: /s/ *Nick Johnson*
Nicholas Johnson

Richard A. Raiders, Esquire
Lengert & Raiders, LLC
606 N. 5th Street
Reading, PA 19601
(*via Email*)

Jessica S. Davis, Esquire
Lindsey A. Bedell, Esquire
Pennsylvania Office of the Attorney
General
1800 Elmerton Avenue
Harrisburg, PA 17110
(*via Email*)

SIANA LAW

Date: April 7, 2022

By: /s/ Christopher P. Gerber
Christopher P. Gerber, Esquire, I.D. #76449
Connie E. Henderson, Esquire, I.D. #327325
Attorneys for Defendant, *Nick Johnson*
941 Pottstown Pike, Suite 200
Chester Springs, PA 19425
(P): 610.321.5500
(F): 610.321.0505
cpgerber@sianalaw.com
cehenderson@sianalaw.com